



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 28 2013

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jason Ryska
Plant Manager
Chrysler Group LLC
Jefferson North Assembly Plant
2101 Connor Avenue
Detroit, Michigan 48215

Dear Mr. Ryska:

This is to advise you that the U.S. Environmental Protection Agency has determined that the Chrysler Group LLC (Chrysler) is in violation of the Clean Air Act (the Act), 42 U.S.C. § 7401 et seq., and the associated state or local pollution control requirements at its Jefferson North Assembly Plant (the facility) located at 2101 Connor Avenue, Detroit, Michigan. We are issuing to you a Notice of Violation (NOV) for these violations which are outlined below.

The Act requires the development of Primary and Secondary National Ambient Air Quality Standards to protect public health and welfare. To attain and maintain these standards, each state is required to develop an implementation plan. Michigan's State Implementation Plan (SIP) includes the requirement that the maximum allowable emission rate specified as a condition of a permit to install or permit to operate should not be exceeded.

At the facility, Chrysler has Permit to Install No. 18-08 (PTI) and Title V Permit No. MI-ROP-N2155-2010 (Title V permit), both of which contain a limitation on the emissions of particulate matter. The purpose of the particulate matter limit is to help protect the public from unhealthy exposures to particulate. Particulate emissions, in particular fine particulate, contribute to respiratory problems, lung damage and premature deaths.

EPA finds that at the facility Chrysler has emitted particulate matter at a rate in excess of its permitted limit in violation of the requirements of its permits, the Michigan SIP, and the Act.

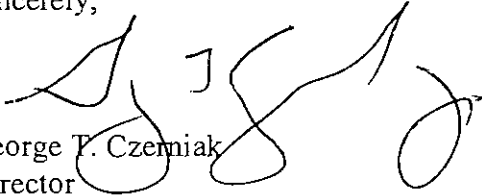
Section 113 of the Act, 42 U.S.C. § 7413, gives us several enforcement options to resolve these violations, including: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action.

We are offering you the opportunity to request a conference with us about the violations alleged in the NOV. A conference should be requested within 10 days following receipt of this notice. A conference should be held within 30 days following receipt of this notice. This conference will provide you a chance to present information on the identified violations, any efforts you

have taken to comply and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

The EPA contact in this matter is Roshni Brahmhatt. You may call her at 312.886.4913 or email her at brahmhatt.roshni@epa.gov to request a conference. EPA hopes that this NOV will encourage Chrysler's compliance with the requirements of the Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Czerniak', written over the printed name.

George T. Czerniak
Director
Air and Radiation Division

Enclosure

cc: Robert Byrnes, Environmental Engineer, Air Quality Division, MDEQ
Tom Hess, Enforcement Chief, Air Quality Division, MDEQ

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Chrysler Group LLC
Jefferson North Assembly Plant
Detroit, Michigan

Proceedings Pursuant to
the Clean Air Act
42 U.S.C. §§ 7401 et seq.

NOTICE OF VIOLATION

EPA-5-13-MI-10

NOTICE OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation under Section 113(a)(1) and (3) of the Clean Air Act (the Act), 42 U.S.C. § 7413(a)(1) and (3). EPA finds that Chrysler Group LLC (you or Chrysler) is violating the Act and the Michigan State Implementation Plan (SIP) at its Jefferson North Assembly Plant as follows:

Statutory and Regulatory Background

1. On May 6, 1980, 45 Fed. Reg. 29790, EPA approved R336.1201 (Permits to Install) as part of the federally enforceable Michigan State Implementation Plan (SIP).
2. The federally enforceable Michigan SIP at R336.1201 provides, in relevant part: "A person shall not install, construct, reconstruct, relocate, or alter any process, fuel-burning equipment, or control equipment pertaining thereto, which may be a source of an air contaminant, until a permit is issued This shall be known as a permit to install and shall cover construction, reconstruction, relocation, and alteration of equipment where such is involved."
3. On July 3, 2006, 71 Fed. Reg. 31093, EPA approved R336.1331 (Emission Limitations and Prohibitions – Particulate Matter) as part of the federally enforceable SIP.
4. The federally enforceable Michigan SIP at R336.1331 provides, in relevant part: "It is unlawful for a person to cause or allow the emission of particulate matter from any process or process equipment in excess of any of the following limits. . . . The maximum allowable emission rate specified as a condition of a permit to install or a permit to operate."
5. 40 C.F.R. § 52.23 states that, among other things, failure to comply with any provisions of this part, any approved regulatory provision of a state implementation plan, any permit condition, or with any permit limitation or condition contained within an operating

permit, renders the person or governmental entity so failing to comply in violation of a requirement and subject to enforcement action under Section 113 of the Act, 42 U.S.C. § 7413.

6. Section 502(a) of the Act, 42 U.S.C. § 7661a, and 40 C.F.R. § 70.7(b), provide that after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate except in compliance with a Title V permit.
7. On December 4, 2001, 66 Fed. Reg. 62949, EPA granted full approval to the Michigan Title V operating permit program. The program became effective on November 30, 2001.
8. Section 113(a)(1)-(3) of the Act, 42 U.S.C. 7413(a)(1)-(3), authorizes the Administrator to initiate an enforcement action whenever, on the basis of any available information, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of, among others, any implementation plan or permit, Title I or Title V of the Act, or any rule promulgated, issued or approved under Title I or Title V of the Act.

Findings of Fact

9. Chrysler owns and operates the Jefferson North Assembly Plant automobile assembly plant where vehicles are assembled and painted, at 2101 Conner Avenue, Detroit, Michigan (the facility).
10. The facility includes three parallel topcoating lines for painting the assembled vehicles. Each line consists of the following areas in sequence: three basecoat robot zones; basecoat electrostatic bells; basecoat automatic conventional zone; heated flash zone; two clearcoat robot zones; clearcoat electrostatic bells zone; and a cure oven.
11. On April 19, 2010, the Michigan Department of Environmental Quality (MDEQ) issued Permit to Install (PTI), No. 18-08 for the facility.
12. In the PTI, FG-FACILITY Emission Limit I.3 contains the following requirement:

The flexible group that covers all equipment used for automotive assembly and painting operations shall not emit more than 42.4 tons per year of particulate matter particles with an aerodynamic diameter less than or equal to a nominal 10 micrometers, or PM₁₀, over a 12-month rolling time period.
13. On December 22, 2010, MDEQ issued a Renewable Operating Permit, No. MI-ROP-N2155-2010 (Title V permit) for the facility.
14. In the Title V permit, FG-FACILITY Emission Limit I.3 contains the following requirement:

The flexible group that covers all equipment used for automotive assembly and painting operations shall not emit more than 42.4 tons per year of particulate matter particles with an aerodynamic diameter less than or equal to a nominal 10 micrometers, or PM₁₀, over a 12-month rolling time period.

15. On May 24, 2012, EPA conducted an inspection of the facility to assess compliance with the Act.
16. On August 21, 2012, EPA issued a Request for Information to Chrysler under Section 114 of the Act, 42 U.S.C. § 7414.
17. Chrysler responded to the Request for Information on October 1, 2012, October 29, 2012, and December 10, 2012.
18. At the facility, Chrysler performed emissions testing for particulate emissions on the paint spraybooths from December 7-16, 2010. The results indicated that the facility was emitting PM₁₀ at the following rates:
 - a. Spraybooth 3 – Basecoat Robot, a rate of 0.912 pounds of PM₁₀ per hour. During the sampling time, a total of 5.47 pounds of PM₁₀ was released and a total of 94 vehicles were painted.
 - b. Spraybooth 3 – Basecoat Manual Zone, a rate of 2.117 pounds of PM₁₀ per hour. During the sampling time, a total of 12.70 pounds of PM₁₀ was released and a total of 119 vehicles were painted.
 - c. Spraybooth 3 – Clearcoat Robot, a rate of 3.013 pounds of PM₁₀ per hour. During the sampling time, a total of 18.08 pounds of PM₁₀ was released and a total of 120 vehicles were painted.
19. In June 2011, at the facility, based on the December 2010 emissions test, Chrysler switched from using an emission factor measured in pounds of PM₁₀ per hour released, to an emission factor measured in pounds of PM₁₀ per vehicle painted. By taking an average of the measured emission factor for the three zones, Chrysler calculated 0.109 pounds of PM₁₀ per vehicle painted as the overall emission factor for the paint spraybooths at the facility.
20. Using the December 2010 performance test data provided by Chrysler in response to the Section 114 Information Request, EPA calculated the overall emission factor for the paint spraybooths to be greater than the facility's calculated overall emission factor.

Violations

21. At the facility, from November 2011 until at least December 2012, Chrysler exceeded the annual PM₁₀ emission limit of 42.4 tons per year specified in the PTI, FG-FACILITY Emission Limit I.3 in violation of Michigan Administrative Code R336.1201 and R336.1331, 40 C.F.R. § 52.23, and 42 U.S.C. § 7410 of the Act.
22. At the facility, from November 2011 until at least December 2012, Chrysler exceeded the annual PM₁₀ emission limit of 42.4 tons per year specified in the Title V permit, FG-FACILITY Emission Limit I.3, in violation of Section 502(a) of the Act, 42 U.S.C. § 7661a, and 40 C.F.R. § 70.7(b).

Environmental Impact of Violations

23. These violations have caused or can cause excess emissions of particulate matter. Particulate matter, especially fine particulates contain microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. Particulate matter exposure contributes to:

- irritation of the airways, coughing, and difficulty breathing;
- decreased lung function;
- aggravated asthma;
- chronic bronchitis;
- irregular heartbeat;
- nonfatal heart attacks; and
- premature death in people with heart or lung disease.

Date

6/28/13

George T. Czerniak
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-13-MI-10, by Certified Mail, Return Receipt Requested, to:

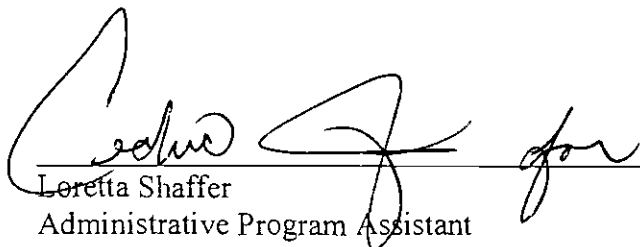
Mr. Jason Ryska, Plant Manager
Chrysler Group LLC, Jefferson North Assembly Plant
2101 Connor Avenue
Detroit, Michigan 48215

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Thomas Hess, Enforcement Chief
Air Quality Division
Michigan Department of Environmental Quality
P.O. Box 30242
Lansing, Michigan 48909

Robert Byrnes
Air Quality Division
Michigan Department of Environmental Quality
525 West Allegan Street
4th Floor North
P.O. Box 30242
Lansing, MI 48909

On the 1st day of July 2013.


Loretta Shaffer
Administrative Program Assistant
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7676 0690